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12 UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

14 UNITED STATES OF AMERICA,

Case no. 2:14-cr-00194-RFB-NJK

15 Plaintiff,

16 vs.

17 GLEN COBB, CHARLES COBB, ANNA
COBB, AND MONICA NAMNARD,

**DEFENDANTS' RENEWED OMNIBUS
MOTION TO RELEASE PASSPORTS
AND PROPOSED ORDERS**

EXPEDITED RELIEF REQUESTED

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Defendants.

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Defendants Glen Cobb, Charles Cobb, Anna Cobb, and Monica Namnard (collectively “defendants”) by and through their attorneys of record, Kathleen Bliss, Esq. and John Kinchen, Esq., hereby submit this renewed motion requesting that the Court enter an order directing Pretrial Services to return each of their passports to them at their request. In support, defendants show the court as follows.

On April 20, 2015, Charles Cobb, Anna Cobb, and Monica Namnard entered guilty pleas to a single misdemeanor count of Accessory After the Fact - Transmission of Gambling Information, in violation of 18 U.S.C. § 3. Docket # 222. On that same day, Glen Cobb entered a

1 guilty plea to two counts of the same offense. *Docket # 223.*

2 All defendants were sentenced on July 28, 2015. Charles, Anna, and Monica each received
3 no term of incarceration and release without any supervision. Glen Cobb received no term of
4 incarceration and one year of supervised release with the computer monitoring condition. No
5 defendant received any travel restrictions. Along with defendant Lycur, LLC, all defendants
6 jointly agreed to the forfeiture of \$4,223,990.

7 On July 29, 2015, after conferring with Pretrial Services, defendants filed an omnibus
8 motion, making the request herein. (Dkt. 243). According to the docket sheet, a response was due
9 on September 15, 2015. None was filed.

10 On Tuesday, September 15, 2015, counsel for defendants contacted Pretrial Services
11 Officer regarding the passports and confirmed that Pretrial Services still has the passports of Anna
12 Cobb, Charles Cobb and Glen Cobb. The passport of Monica Namnard was taken by the
13 government upon her arrest in Los Angeles and was supposed to be transferred to the Las Vegas
14 office. However, the whereabouts of it are not clear. The individual defendants now request that
15 the Court direct Pretrial Services to release their passports to them at their request. This may also
16 entail the Court ordering Pretrial Services to locate, through its contacts in Los Angeles, the
17 passport of Monica Namnard. Further, defendants request that the Court do so on an expedited
18 basis else their passports will be transferred to the State Department.

19 DATED this 17th day of September 2015.

20 By: /s/ Kathleen Bliss
21 Kathleen Bliss
22 The Federal Defenders Law Group, LLC
23 4240 West Flamingo Road
24 Suite 220
25 Las Vegas NV, 89103
26 702-366.1888

27 By: /s/ John Kinchen
28 John Kinchen
Hughes Arrell Kinchen LLP
1221 McKinney, Suite 3150
Houston, TX 77010
713-403-2064

1 **ORDER**

2 Upon review of defendant Glen Cobb's motion to release passport, and good cause
3 appearing, it is hereby ORDERED, ADJUDGED, and DECREED that the U.S. Pretrial Services
4 Office is directed to release Glen Cobb's passport to him upon his request.

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6 Dated this 18th day of September, 2015.

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RICHARD F. BOULWARE, II
United States District Judge

ORDER

Upon review of defendant Charles Cobb's motion to release passport, and good cause appearing, it is hereby ORDERED, ADJUDGED, and DECREED that the U.S. Pretrial Services Office is directed to release Charles Cobb's passport to him upon his request.

Dated this 18th day of September 2015.

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RICHARD F. BOULWARE, II
United States District Judge

ORDER

Upon review of defendant Anna Cobb's motion to release passport, and good cause appearing, it is hereby ORDERED, ADJUDGED, and DECREED that the U.S. Pretrial Services Office is directed to release Anna Cobb's passport to her upon her request.

6 | Dated this 18th day of September, 2015.


RICHARD F. BOULWARE, II
United States District Judge

ORDER

Upon review of defendant Monica Namnard's motion to release passport, and good cause appearing, it is hereby ORDERED, ADJUDGED, and DECREED that the U.S. Pretrial Services Office is directed to locate and release Monica Namnard's passport to her upon her request.

Dated this 18th day of September, 2015.

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RICHARD F. BOULWARE, II
United States District Judge

CERTIFICATE OF SERVICE

In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure and Rule 47-11
of the Local Rules of Practice for the United States District Court for the District of Nevada, I
certify that I am an employee of The Federal Defenders Law Group, LLC, and that on this 17th
day of September, 2015, I did cause a true and correct copy of :

**DEFENDANTS' RENEWED OMNIBUS MOTION TO RELEASE PASSPORTS
AND PROPOSED ORDERS**

8 to be served via the Court's CM/ECF system to the parties on the Electronic Filing System in this
9 action.

10

11 Andrew Duncan
12 Assistant United States Attorney
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13 Suite 5000
14 Las Vegas, NV 89101
Email: andrew.duncan@usdoj.gov

By: /s/ Krystle Platero
An employee of
The Federal Defenders Law Group, LLC

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